

MAY 15 2019

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

JULIA C. DUDLEY, CLERK
BY: *E. Surde*
DEPUTY CLERK.

UNITED STATES OF AMERICA) Criminal Number: 1:19-CR-22
v.)
WAQAR UL-HASSAN) In Violation of:
) 18 U.S.C. § 1001 (False Statements
) Involving International Terrorism
)

INDICTMENT

The Grand Jury charges, at all times material to this Indictment:

Introduction

1. The defendant, WAQAR UL-HASSAN, is a Pakistani national and a naturalized United States citizen. UL-HASSAN has retained his Pakistani citizenship.

The Islamic State of Iraq and al-Sham

2. On or about October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (“AQI”), then known as Jam ‘at al Tawid wa’ al-Jahid, as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS” – which is how the FTO will be referenced herein), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq

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wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State and ISIS. To date, ISIS remains a designated FTO.

3. Beginning in 2014, using social media, ISIS has called for attacks against citizens – civilian and military – of the countries participating in the United States-led coalition against ISIS. For instance, on September 21, 2014, ISIS released a speech of Abu Muhammed Al-Adnani, a former senior leader and official spokesman of ISIS, who is now deceased. In this speech, entitled, “Indeed Your Lord is Ever Watchful,” Al-Adnani calls on Muslims who support ISIS from around the world to “defend the Islamic State” and to “rise and defend your state from your place where you may be.” More recently, using social media, ISIS has been encouraging individuals to kill specific persons within the United States.

Jaish-e-Mohammad

4. On or about December 26, 2001, the United States Secretary of State designated Jaish-e-Mohammed (JeM) as a Foreign Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act. JeM is an Islamic extremist group based in Pakistan that was founded in early 2000 by Masood Azhar, a former senior leader of Harakat ul-Ansar, upon his release from prison in India. The group’s aim is to unite Kashmir with Pakistan, and it has openly declared war against the United States. It is politically aligned with the radical political party Jamiat Ulema-i-Islam’s Fazlur Rehman faction (JUI-F). Pakistan outlawed JeM in 2002. By 2003, JeM had splintered into Khuddam ul-Islam (KUI), headed by Azhar, and Jamaat ul-Furqan (JUF), led by Abdul Jabbar, who was released from Pakistani custody in August 2004. Pakistan banned KUI and JUF in November 2003.

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5. JeM has continued to operate openly in parts of Pakistan despite being banned by the Pakistani government. Since 2000, JeM has conducted many fatal terrorist attacks. JeM claimed responsibility for several suicide car bombings in Kashmir, including an October 2001 suicide attack on the Jammu and Kashmir legislative assembly building in Srinagar that killed more than 30 people. In July 2004, Pakistani authorities arrested a JeM member wanted in connection with the 2002 abduction and murder of U.S. journalist Daniel Pearl. In 2006, JeM claimed responsibility for a number of attacks, including the killing of several Indian police officials in the Indian-administered Kashmir capital of Srinagar.

COUNT ONE
(False Statements Involving Terrorism)
18 U.S.C. § 1001

6. The allegations set forth in paragraphs 1 through 5 are incorporated by reference as if fully set forth herein.

7. On or about May 20, 2015, within the Western District of Virginia and elsewhere, the defendant, WAQAR UL-HASSAN, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, his statements to agents of the Federal Bureau of Investigation, who were conducting an international-terrorism investigation, that he did not support any terrorist groups or extremists, and did not know anyone who was a member of a terrorist or extremist group.

8. The offense involved international terrorism.

All in violation of Title 18, United States Code, Sections 1001(a)(2).

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COUNT TWO
(False Statements Involving Terrorism)
18 U.S.C. § 1001

9. The allegations set forth in paragraphs 1 through 5 are incorporated by reference as if fully set forth herein.

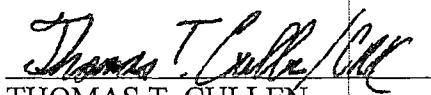
10. On or about October 16, 2015, within the Western District of Virginia and elsewhere, the defendant, WAQAR UL-HASSAN, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, to wit, his statements to agents of the Federal Bureau of Investigation, who were conducting an international-terrorism investigation, that he never tried to send money to Syria for ISIS and that he never asked anyone about sending money to ISIS.

11. The offense involved international terrorism.

All in violation of Title 18, United States Code, Sections 1001(a)(2).

A TRUE BILL this 15 day of May, 2019

/s/Foreperson
FOREPERSON


THOMAS T. CULLEN
UNITED STATES ATTORNEY

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